



Certificate of Compliance

I, Fred Arcuri, Sr. VP/COO of SureWest, hereby certify pursuant to Section 64.2009(e) of the FCC's rules, that I have personal knowledge that SureWest Long Distance has established operating procedures that are adequate to ensure that the Company is in compliance with the FCC's Customer Proprietary Network Information rules, as set forth in 47 C.F.R. Section 64.2001 *et seq.* Attached is a Statement explaining how the Company's operating procedures ensure that it is in compliance with the CPNI rules.

By: 

Date: February 3, 2006

Statement of CPNI Operating Procedures and Policies

SureWest Long Distance (the "Company") has operating procedures designed to ensure that the Company is in compliance with the FCC's Customer Proprietary Network Information ("CPNI") rules.

1. The Company has implemented a system designed to verify the status of and protect a customer's CPNI. Because the Company does not use CPNI in marketing or sale of services, the customer's CPNI approval status is always considered to be "do not use," except for any purposes which are permitted under law without customer prior approval, such as for maintenance of a customer's current services, and prevention of fraudulent, abusive or unlawful use of telecommunications services. The Company does not share CPNI between affiliates, nor does it make CPNI available to third party vendors.
2. Company personnel are trained specifically regarding federal (47 U.S.C. Section 222 and 47 C.F.R. Part 64, Subpart U) and California (Public Utilities Code Section 2891) requirements for protection and use of CPNI. This information is posted in the Company's personnel Knowledge Management System that is used when discussing information with a customer regarding their service. Company personnel are subject to disciplinary action for failure to comply with CPNI rules.
3. Should the Company ever utilize CPNI in any sales or marketing campaigns, or disclose CPNI to third parties, the Company would maintain records of all such instances of use or disclosure. These records would include a description of the sales or marketing campaign and a record of all the customers whose CPNI were used for the campaign, or disclosed to a third party. The records would be maintained for at least one year.
4. The Company has established a supervisory review process regarding carrier compliance with the CPNI rules. Supervisors in the call center are required to monitor calls randomly to assure all procedures are being adhered to.
5. The Company will provide written notice to the FCC within five business days of any instance where the required opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.